

**Hearing Date and Time: May 4, 2023 at 10:00 a.m. (ET)**  
**Objection Deadline: April 27, 2023 at 4:00 p.m. (ET)**

**DUANE MORRIS LLP**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

ERBO PROPERTIES, LLC, *et al.*<sup>1</sup>,  
  
Debtors.

Chapter 11

Case No. 23-10210 (LGB)

Jointly Administered

**NOTICE OF MOTION OF 541 W 21 SME LLC FOR AN ORDER TERMINATING THE  
AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362 AND OTHER RELATED RELIEF**

**PLEASE TAKE NOTICE** that on May 4, 2023 at 10:00 a.m. ET, or as soon thereafter as counsel may be heard (the “Hearing”), 541 W 21 SME LLC (“SME”), by and through its undersigned attorneys, shall move before the Honorable Lisa G. Beckerman, in the United States Bankruptcy Court for the Southern District of New York (the “Court”) for an order terminating the automatic stay pursuant to 11 U.S.C. § 362 and Other Related Relief (the “Motion”).

**PLEASE TAKE FURTHER NOTICE**, that the Hearing will held via Zoom for Government. Any party who wishes to attend the Hearing is required to register their appearance

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<sup>1</sup> The Debtors are ERBO Properties LLC (EIN x9179), Case No.: 23-10210, with a mailing address at 551 Bedford Avenue, Brooklyn, NY 11211; KOVA 521, LLC (EIN x9972), Case No.: 23-10211, with a mailing address at 551 Bedford Avenue, Brooklyn, NY 11211; and Gold Mezz LLC (EIN x4741), Case No.: 23-10212, with a mailing address at 551 Bedford Avenue, Brooklyn, NY 11211

by 4:00 p.m. one business day before any scheduled Zoom hearing with the eCourt Appearances tool on the Court's website. Judge Beckerman's Zoom instructions can be found at [https://www.nysb.uscourts.gov/sites/default/files/Judge\\_Beckerman\\_Zoom\\_Procedures.pdf](https://www.nysb.uscourts.gov/sites/default/files/Judge_Beckerman_Zoom_Procedures.pdf). The Hearing may be adjourned, from time to time, by announcement in open Court without any further or other notice thereof

**PLEASE TAKE FURTHER NOTICE** that responses or objections to the Motion, if any, must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be (a) filed with the Bankruptcy Court electronically in accordance with General Order 599 (which can be found at [www.nyeb.uscourts.gov](http://www.nyeb.uscourts.gov)), and (b) served on: (i) Duane Morris LLC, attorneys for SME, 1037 Raymond Boulevard, Suite 1800, Newark, NJ 07102 (Attn: Morris S. Bauer, Esq.); (ii) Office of the U.S. Trustee, Southern District of New York, One Bowling Green, Room 534 New York, NY 10004 (Attn: Tara Tiantian); and (iii) the Bankruptcy Judge (a hard copy clearly marked "Chambers Copy" must be delivered to the Bankruptcy Court to the attention of Chambers of the Honorable Lisa G. Beckerman, United States Bankruptcy Judge, so as to be so filed and received no later than **April 27, 2023 at 4:00 p.m.** (the "Objection Deadline").

**PLEASE TAKE FURTHER NOTICE** that if no responses or objections are timely filed and served, the Court may grant the relief requested in the Motion without a hearing.

Dated: New York, New York  
April 18, 2023

**DUANE MORRIS LLP**

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